

1 The Honorable Richard A. Jones  
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9 UNITED STATES DISTRICT COURT  
10 FOR THE WESTERN DISTRICT OF WASHINGTON  
11 AT SEATTLE

12 BOMBARDIER, INC., ) NO. 2:18-cv-1543 RAJ  
13 Plaintiff, )  
14 v. ) DECLARATION OF RICHARD  
15 MITSUBISHI AIRCRAFT CORPORATION, ) READE IN SUPPORT OF THE  
16 MITSUBISHI AIRCRAFT CORPORATION ) AEROTEC DEFENDANTS  
17 AMERICA, INC.; AEROSPACE TESTING ) OPPOSITION TO MOTION FOR  
18 ENGINEERING & CERTIFICATION, INC.; ) PRELIMINARY INJUNCTION  
19 MICHEL KORWIN-SZYMANOWSKI; )  
LAURUS BASSON; MARC-ANTOINE )  
DELARCHE; CINDY DORNÉVAL; KEITH )  
AYRE; and JOHN AND/OR JANE DOES 1-88.)  
Defendants. )  
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21 I, Richard Reade, declare as follows:

22 1. I am the Lead of the Technology & Digital Innovation department of defendant  
23 Aerospace Testing Engineering & Consulting, Inc. ("AeroTEC"). I make this declaration based  
24 on personal knowledge and information, a review of AeroTEC's business records, and information  
25 provided to me by AeroTEC employees and representatives. I am over the age of 18 and otherwise  
26 competent to testify to the matters stated herein.  
27

READE DECLARATION - 1  
#1217479 v4 / 45898-028

KARR TUTTLE CAMPBELL  
701 Fifth Avenue, Suite 3300  
Seattle, Washington 98104  
Main: (206) 223 1313  
Fax: (206) 682 7100

1       2.     AeroTEC assigns a company-owned laptop and/or desktop computer to its  
 2 employees. AeroTEC employees typically are not issued a company mobile phone, but it offers  
 3 employees reimbursement for phone charges.

4       3.     AeroTEC creates and maintains a record for each AeroTEC device that is assigned  
 5 to an employee, and these records contain the normal identifiers including model number, part  
 6 number, serial number, host name, and AeroTEC identifiers assigned to each device, along with  
 7 the associated employee's name.

8       4.     I have reviewed AeroTEC's records and confirmed the following:

9           a. AeroTEC employee Michel Korwin-Szymanowski been assigned a total of one  
 10           AeroTEC laptop since he started work on March 11, 2015. The laptop is identified  
 11           as: Microsoft Surface Pro 3\_SURFACE001. He was never assigned an AeroTEC  
 12           desktop computer.

13           b. AeroTEC employee Laurus Basson been assigned a total of one AeroTEC laptop  
 14           since he started work on March 14, 2016. The laptop is identified as:  
 15           Laptop\_SKYHOPPER339. He was also assigned a total of one AeroTEC desktop  
 16           identified as Desktop\_PRECISION106.

17           c. Former AeroTEC employee Marc-Antoine Delarche was assigned a total of one  
 18           AeroTEC laptop from the date he started work on July 11, 2016, to his last day on  
 19           August 10, 2018. The laptop is identified as: Laptop\_SKYHOPPER125. He was  
 20           also assigned a total of one AeroTEC desktop identified as  
 21           Desktop\_PRECISION153. AeroTEC retained possession of these computers after  
 22           Mr. Delarche terminated his employment.

23           d. AeroTEC employee Cindy Dornéval has been assigned a total of two AeroTEC

laptops since she started work on February 20, 2017. The laptops are identified as:

Laptop\_SKYHOPPER335 and Laptop\_SKYHOPPER196. She was never assigned an AeroTEC desktop computer.

The foregoing AeroTEC laptops and desktop computers were all provided to Fronteo for forensic imaging.

5. None of the above employees were ever assigned an AeroTEC phone or other device.

6. AeroTEC maintains and operates a total of four network-based file share servers. The host names for these servers are: Roaddedge2, Fileedge, Fileedge3, and Commonshare. Fileedge is a legacy server, and the files on that server that are accessible to employees are also contained on the FileEdge3 production server. Commonshare is a server that contains data of both AeroTEC and MITAC America. RoadEdge2 is a server that contains the files of offloaded AeroTEC employees.

7. The above servers contain approximately 44 terabytes of data. AeroTEC has diligently tried to get as much data to Fronteo as possible so they could process the data and run searches for the documents at issue in this litigation. Given the amount of data and timing restraints, we have to date delivered all .doc, .docx, .pptx, and .pdf files<sup>1</sup> from the FileEdge3 and Commonshare servers, as well as the legacy files from RoadEdge2 that were related to former employee Marc-Antoine Delarche, to Fronteo USA, Inc. (“Fronteo”).

8. Processing the data is an immense and time-consuming process, and AeroTEC is continuing to transfer data to Fronto from other AeroTEC servers, backups and devices.

I declare under penalty of perjury of the laws of the United States that the foregoing is true.

<sup>1</sup> I was advised that these were the file types attached to the emails at issue in Bombardier's Preliminary Injunction Motion.

1 and accurate.

2 Executed this 26<sup>th</sup> day of December, 2018, at Seattle, Washington.

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4 Richard Reade

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